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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE:

Alejandro Vincente Perez and  
Cathy Hanenberg Perez,  
  
Debtors.

Honorable Rosemary Gambardella

Chapter 13

Bankruptcy No. 10-24182 RG

Alejandro Vincente Perez and  
Cathy Hanenberg Perez,

Plaintiffs,

Adv. Proc. No. 11-ap-2711 RG

v.

**Hearing Date: July 31, 2013**

JPMorgan Chase Bank, N.A., Chase Home Finance  
LLC; and Phelan Hallinan & Schmieg, PC,

Defendants.

**CERTIFICATION OF KENNETH S. GOODKIND IN SUPPORT OF MOTION  
OF DEFENDANT PHELAN HALLINAN & DIAMOND, PC FOR SANCTIONS  
AND RELATED RELIEF PURSUANT TO FRCP 11, FRBP 9011,  
28 U.S.C. § 1927 AND/OR THE COURT'S INHERENT POWERS,  
BASED UPON THE SECOND AMENDED COMPLAINT**

I, KENNETH S. GOODKIND, ESQ., of full age, do hereby certify that:

1. I am counsel to Phelan Hallinan & Diamond, PC, f/k/a Phelan Hallinan & Schmieg, PC ("PHD"), a Defendant in the above-captioned Adversary Proceeding. I make this Certification in Support of PHD's Motion for Sanctions and Related Relief Pursuant to FRCP 11, FRBP 9011, 28 U.S.C. § 1927 and/or the Court's Inherent Powers, Based Upon the Second Amended Complaint (the "Motion").

2. The Motion seeks sanctions against Andy Winchell, Esquire, counsel for debtors Alejandro Vincente Perez and Cathy Hanenberg Perez (“Debtors”) for filing and prosecuting a frivolous lawsuit against PHD. PHD requests sanctions, including an award of its counsel fees, incurred in connection with this litigation, and any such other and further relief as the Court deems just and proper.

3. I certify that the factual statements contained within the Brief in support of the Motion are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

FLASTER/GREENBERG P.C.

Dated: June 28, 2013

By: /s/ Kenneth S. Goodkind  
KENNETH S. GOODKIND, ESQUIRE